

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

IVELISSE DONES ALICEA

DEBTORS

CASE NO. 16-00517 (ESL)

CHAPTER 13

MOTION REQUESTING ADDITIONAL TIME

TO THE HONORABLE COURT:

COMES NOW FIRSTBANK, represented by its undersigned attorney and to this Honorable Court very respectfully states and prays:

- 1- That on May 18, 2016 debtor's chapter 13 trustee Mr. Alejandro Oliveras Rivera filed an objection to Firstbank's claim number 6.
- 2- That FirstBank wishes to present its reply to said opposition buy it is in need to order new tittle searches of the subject property in order to be able to file an adequate and substantiated reply.
- 3- FirstBank is in need of twenty (20) additional days to file its reply.

WHEREFORE, it is hereby respectfully requested that for the aforesaid reasons FirstBank be granted an additional twenty (20) days to file its reply.

CERTIFICATE OF SERVICE: I HEREBY CERTIFY That on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to of such filing to **Ms. Monsita Lecaroz Arribas**, Esq. US Trustee's Office, Ochoa Building, Suite 301, 500 Tanca St., San Juan, PR 00901; **Mr. Alejandro Oliveras Rivera**, Esq. Chapter 13 Trustee, PO Box 9024062, San Juan, PR 00902-4062 and to Debtor's attorney **Mr. Roberto Figueroa Carrasquillo** to PO Box 186, Caguas, PR 00726-0186 Email:cmef@rfclawpr.com.

In San Juan, Puerto Rico, this 14th day of June of 2016.

/s/ F. DAVID GODREAU ZAYAS
USDC-PR NO. 123207
Counsel for Firstbank Puerto Rico
GODREAU & GONZALEZ, LLC.
P.O. BOX 9024176
SAN JUAN, PUERTO RICO 00902-4176
TEL.: (787) 726-0077
E-MAIL: dg@g-glawpr.com